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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF CALIFORNIA**

**TOMAS PELHRIMOVSKY,  
VLADAMIR CIKKEL, LUKAS  
GOMBIK, JAKUB JIRSAK, DANIEL  
FERENCIK, SEBASTIAN FIALA, and  
MAREK HRABAL**

**Plaintiffs,**

**v.**

**M. STEVENS,**

**Defendant.**

**CASE No.:**

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

**INTRODUCTION**

1. Plaintiffs are foreign individuals each of whom is the owner of copyrights in various photographic images.

2. Defendant, without permission from Plaintiffs, published the photographic works on the website <http://belamigossip.blogspot.com>.





**CLAIM**

(Copyright Infringement – 17 U.S.C. § 101 ET SEQ.)

19. Plaintiff repeats and incorporates by this reference each and every allegation set forth in the previous paragraphs as if set forth fully herein.

20. Plaintiffs are informed and believe and based thereon allege that Defendant M. STEVENS operates the website at <http://belamigossip.blogspot.com>.

21. Each Plaintiff was involved in the creation of various photographs and owns the copyrights to one or more of the photographs that Defendant copied from other Internet locations and published on his website at the following locations:

- a. Plaintiff Sebastian Fiala holds the copyrights to the image(s) posted at <http://belamigossip.blogspot.com/2014/01/tom-pollock-on-google.html>;
- b. Plaintiff Jakub Jirsak holds the copyrights to the image(s) posted at <http://belamigossip.blogspot.com/2014/05/claude-sorel-and-girlfriend.html>;
- c. Plaintiff Marek Hraba holds the copyrights to the image(s) posted at <http://belamigossip.blogspot.com/2014/05/jack-harrer-having-fun.html>;
- d. Plaintiff Vladamir Cikkel holds the copyrights to the image(s) posted at <http://belamigossip.blogspot.com/2014/05/jamie-durrell-on-facebook.html>;
- e. Plaintiff Tomas Pelhrimovsky holds the copyrights to the image(s) posted at <http://belamigossip.blogspot.com/2014/05/jean-daniel-chagall-and-baby.html>;
- f. Plaintiff Daniel Ferencik holds the copyrights to the image(s) posted at <http://belamigossip.blogspot.com/2014/05/johan-paulik-new-facebook-photo.html>; and

1 g. Plaintiff Lukas Gombik holds the copyrights to the image(s) posted at  
2 [http://belamigossip.blogspot.com/2014/05/kevin-warhol-and-girlfriend-in-](http://belamigossip.blogspot.com/2014/05/kevin-warhol-and-girlfriend-in-south.html)  
3 [south.html](http://belamigossip.blogspot.com/2014/05/kevin-warhol-on-facebook.html) and [http://belamigossip.blogspot.com/2014/05/kevin-warhol-on-](http://belamigossip.blogspot.com/2014/05/kevin-warhol-on-facebook.html)  
4 [facebook.html](http://belamigossip.blogspot.com/2014/05/kevin-warhol-on-facebook.html).

5  
6 22. Defendant STEVENS copied each of the above referenced photographs, either  
7 individually or as part of an entire webpage and distributed the photographs by and through  
8 the above referenced urls, without obtaining the permission of the Plaintiffs as copyright  
9 owners.

10  
11 **JURY DEMAND**

12 23. Plaintiff hereby demands a jury trial in this case.

13 **PRAYER**

14 WHEREFORE, Plaintiff respectfully requests judgment as follows:

15 (1) that the Court enter a judgment against Defendant that he has willfully infringed  
16 Plaintiffs' copyrights under 17 U.S.C. § 501,

17 (2) that the Court issue injunctive relief against Defendant, and that Defendant, his  
18 agents, representatives, servants, employees, attorneys, successors and assigns, and all others  
19 in active concert or participation with him, be enjoined and restrained from copying, posting  
20 or making any other infringing use or infringing distribution of Plaintiffs' photographs;

21 (3) that the Court enter an order of impoundment pursuant to 17 U.S.C. §§ 503 and  
22 509(a) impounding all infringing copies of Plaintiffs' photographs which are in Defendant's  
23 possession or under his control;  
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1 (4) That the Court order Defendant to pay Plaintiffs' damages and Defendant's  
2 profits pursuant to 17 U.S.C. § 504(b); and

3 (5) that the Court grant to Plaintiffs such other and additional relief as is just and  
4 proper.  
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6  
7 Dated: September 30, 2014

Respectfully Submitted,

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9 by /s/ D. Gill Sperlein

10 D. GILL SPERLEIN  
11 THE LAW OFFICE OF D. GILL SPERLEIN  
12 Attorneys for Plaintiffs  
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